

**IN THE U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BLUDGEON RIFFOLA LTD.,

Plaintiff,

v.

ALI GEGE STORE, et al.,

Defendants.

Case No. 21-cv-02525

Judge Gary Feinerman

Magistrate Judge Beth W. Jantz

Declaration of Isaku M. Begert

DECLARATION OF ISAKU M. BEGERT

I, Isaku M. Begert, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Bludgeon Riffola Ltd. (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. Defendant Womens Dresses -YIISU’s (“Defendant”) filings [78] and [88], attached hereto as **Exhibit 1**, share a number of common unique identifiers. For example, PDF metadata for each of these files identifies the author as “GA310” and that the files were created using Neevia PDF Stamp v4.0. The metadata for filings [78] and [88] are shown in Figures 1 and 2 below, respectively. The filings have the same look and feel, including the use of the Calibri font and a center-aligned signature block that explicitly points out that Defendant is a *pro se* litigant. Despite purportedly being a *pro se* litigant, the documents refer to Defendant in the third person. The documents also read like they were drafted by a lawyer with legal training, including citations to specific U.S. statutes and unpublished cases.

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: 1A44462

Title:

Author: GA310

Subject:

Keywords:

Created: 3/2/2022 8:08:00 AM

Modified: 3/7/2022 4:30:14 PM

Application: Microsoft Office Word

Additional Metadata...

Advanced

PDF Producer: Neevia PDFstamp v4.0 (<http://neeviaPDF.com>); modified using iText® 7.1.6 ©2000-2019 iText Group NV (Administrative Office)

PDF Version: 1.5 (Acrobat 6.x)

Location: P:\docs\6793\145112\

File Size: 1.94 MB (2,032,767 Bytes)

Page Size: 8.27 x 11.69 in

Number of Pages: 9

Tagged PDF: No

Fast Web View: No

Help OK Cancel

Figure 1 – Metadata for Docket No. 78

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: 1AC5973

Title:

Author: GA310

Subject:

Keywords:

Created: 4/9/2022 3:35:00 AM

Modified: 4/15/2022 5:21:52 PM

Application: Microsoft Office Word

Additional Metadata...

Advanced

PDF Producer: Neevia PDFStamp v4.0 (<http://neeviaPDF.com>); modified using iText® 7.1.6 ©2000-2019 iText Group NV (Administrative Office)

PDF Version: 1.5 (Acrobat 6.x)

Location: P:\docs\6793\145112\

File Size: 172.12 KB (176,251 Bytes)

Page Size: 8.27 x 11.69 in

Number of Pages: 4

Tagged PDF: No

Fast Web View: No

Help OK Cancel

Figure 2 – Metadata for Docket No. 88

3. Plaintiff's investigation has identified documents filed on behalf of sixteen other “*pro se*” defendants in eleven cases that have these same unique identifiers. PDF metadata for each of the eleven other “*pro se*” filings show that they were also authored by “GA310” and created using Neevia PDF Stamp v4.0. Each of these filings has other similar features, including font, layout, center-aligned signature blocks, and referring to defendants in the third person. Some of the signature blocks also explicitly point out that the defendant is a

pro se litigant. **Exhibit 2** attached hereto is a true and correct copy of the *pro se* filings and **Exhibit 3** attached hereto is a true and correct copy of screenshots of the PDF metadata.

No.	NDIL Case No and Docket No.	Filing	Defendant Name
1	21-cv-05331 [60]	Opposition To Plaintiff's Motion For Default Judgment	Athli, Frroy and LierTOUR
2	21-cv-05331 [62]	Response to Plaintiff's Motion For Default Judgment and Complaint	chuyanxi
3	21-cv-05339 [45]	Reply to plaintiff's response	Di Long
4	21-cv-05339 [55]	Motion To Modify Judgment Order	HAOCHEN
5	21-cv-06162 [38]	Opposition To Plaintiff's Motion For Preliminary Injunction Order	JOLLGII
6	21-cv-05331 [28]	Opposition to plaintiff's motion to extend temporary restraining order	Keepplus2021
7	21-cv-05331 [63]	Answer to plaintiff's complaint	Lin Qinlan, Athli, Frroy and LierTOUR
8	22-cv-02450 [34]	Opposition To Plaintiff's Motion for Preliminary Injunction Order	Luo Dan
9	21-cv-05331 [36]	Motion for relief	MANmanDanta
10	22-cv-02705 [38]	RESPONSE TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION ORDER	drindf
11	22-cv-01172 [36]	Opposition To Plaintiff's Motion for Preliminary Injunction Order	Kingspinner 715 days

4. Prior to filing the Motion to Vacate Judgment Order [78], Defendant contacted Plaintiff's counsel using email address dekanhuan55819@163.com, but also included the email address cdzvrxtg@yeah.net. The email address cdzvrxtg@yeah.net was also used by defendant HAZhenha that appeared in NDIL Case No. 21-cv-05339. Figure 3 below is a

true and accurate copy of a screenshot of the email from Defendant, while Figure 4 below is a true and accurate copy of a screenshot of the email from defendant HAZhenha.

From: dekanhuan55819@163.com <dekanhuan55819@163.com>
Sent: Thursday, February 17, 2022 6:26 AM
To: attorney@gbcinternetenforcement.net; Isaku Begert <ibegert@gbc.law>; cdzvrbtnq@yeah.net
Subject: 21-cv-2525; Bludgeon Riffola, Ltd. v. The Partnerships; Clarayan (Account: AGKXCV86IEF2H)

Counsel,

We hope the message finds you well. Amazon said that you sued the store for intellectual property infringement, making the store account inactive. We need to reach a settlement with you in order to reactivate the store. Can you please let us know the cause of action? And how you can release the store ?

Looking forward to your reply,

The Defendant Clarayan (Account AGKXCV86IEF2H)

Figure 3

From: cdzvrbtnq@yeah.net <cdzvrbtnq@yeah.net>
Sent: Sunday, February 13, 2022 11:45 PM
To: Isaku Begert <ibegert@gbc.law>
Cc: Marcella Slay <mslay@gbc.law>; Justin Gaudio <jgaudio@gbc.law>
Subject: Re: HAZhenha - Settlement Demand - PEANUTS 21-cv-5339; GBC 6904*146852

Isaku,

See attached payment vouchers, please confirm whether you have received the funds, then release the store.

Thank you,

Liu

Figure 4

5. Defendant has also contacted Amazon multiple times seeking release of its account. Plaintiff's attorneys have either been copied on or forwarded copies of these emails. In sending these emails, Defendant was knowledgeable enough to direct the email to Amazon's outside counsel that processes such court orders, including one of the specific paralegals that handles such

requests. Figure 5 below is a true and accurate copy of screenshots of emails from Defendant to Amazon's outside counsel, which were forwarded to Plaintiff's counsel.

----- Replied Message -----

From: johnseller<johnseller@yeah.net>
 Date: 6/7/2022 21:31
 To: AmazonTROs@dw.com<AmazonTROs@dw.com>
 Cc: [REDACTED]@dw.com [REDACTED]@dw.com
 Subject: Contact for restrained funds/Case No:21-cv-2525/BLUDGEON RIFFOLA LTD., v.Does/Northern District Court in Illinois.

Dear [REDACTED],

Following up on the matter.

We are writing to inform you that the Court has **vacated** the default judgment against the store below, please see attached Order, and the TRO expired after June 15,2021. Therefore, we respectfully request you release the store from TRO.

1

Defendant Number	Store Name	Account
121	Womens Dresses -YIISU	AGKXCV86IEF2H

Thank you and best regards,

YIISU

----- Replied Message -----

From: dekanhuan55819@163.com<dekanhuan55819@163.com>
 Date: 4/27/2022 21:18
 To: AmazonTROs@dw.com<AmazonTROs@dw.com>
 Cc: [REDACTED]@dw.com [REDACTED]@dw.com
 Subject: Contact for restrained funds/Case No:21-cv-2525/BLUDGEON RIFFOLA LTD., v.Does/Northern District Court in Illinois.

Dear [REDACTED],

Please see attached order, according to records of hearing held on April 19, 2022. The Court is considering to dismiss the store below because the Court has no personal jurisdiction over the defendant and restrained funds have nothing to do with accused activity. Therefore, I hope you can follow the court records, and release the store, if you can.

Defendant Number	Store Name	Account	Hearing time
121	Womens Dresses -YIISU	AGKXCV86IEF2H	April 19,2022

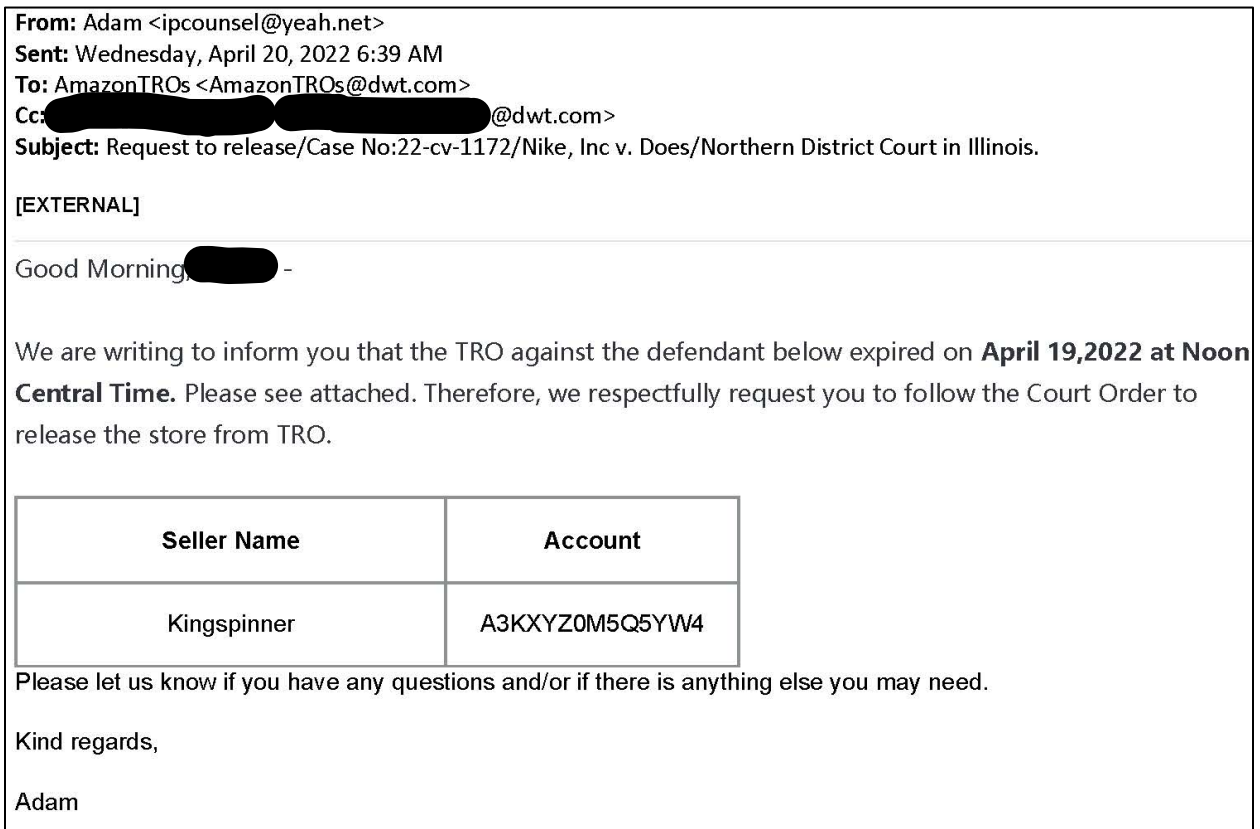
Thank you and best regards,

2

YIISU

Figure 5

6. Other defendants listed in Table 1, all of which are directly connected to Defendant based on unique metadata, have sent similar emails directly to Amazon's outside counsel. Plaintiff's attorneys have either been copied on or forwarded copies of these emails. For example, Defendant 11 (Kingspinner 715 days) sent emails directly to Amazon's outside counsel from email address ipcounsel@yeah.net ("ip" is a common abbreviation for intellectual property). The same ipcounsel@yeah.net email address similarly contacted Amazon's outside counsel for twelve different defendants in NDIL Case No. 21-cv-05863. Figures 6 and 7 below are true and accurate copies of screenshots of these emails.

*Figure 6*

From: Adam <ipcounsel@yeah.net>
 Sent: Tuesday, April 19, 2022 7:00 AM
 To: AmazonTROs <AmazonTROs@dwt.com>
 Subject: Request to release/Case No:21-cv-5863/PEANUTS WORLDWIDE LLC v.Does/Northern District Court in Illinois.

[EXTERNAL]

1

Good Morning [REDACTED]

We have reached settlement agreements as to these stores below. Plaintiff has dismissed these defendants from the lawsuit on **January 21, 2022**, please see attached, however, these stores haven't been released, could you please follow up on the matter.

Def No.	Seller Name	Account	Withdrawal Date
112	Wear-DOY	A2YNMWKAOZTIB3	January 21, 2022
123	yangqiangrto	A35H7PBAMF1HG5	January 21, 2022
139	justHIGH	A3GFCUZSUT2EUY	January 21, 2022
141	Wirziis Fashion US7-16 Days Delivery	A3I7AMG8SMET6J	January 21, 2022
170	Hodudu-US Store	AHQNJ4QPVDASC	January 21, 2022
187	XXYQSMYXGS	AT2DONXC9SX92	January 21, 2022
92	Viadha	A2DT1N4VQHK1K4	January 21, 2022
32	SAINGACE	A13AM3NT30UQQF	January 21, 2022
36	Vicetion US	A167QDB4UICE94	January 21, 2022
104	xigua&shuang	A2T6B2ER1TO9LG	January 21, 2022
117	Arrived quickly in 7-15 days!	A3060WWJO58QA1	January 21, 2022
143	Vicetion	A3KXMA44R71UH7	January 21, 2022

Please let us know if you have any questions and/or if there is anything else you may need.

Thank you and best regards,

2

Adam

Figure 7

7. The email address ipcounsel@yeah.net was also copied on an email to Plaintiff's counsel for Defendant Viccki in NDIL Case No. 21-cv-01986. Figure 8 below is a true and accurate copy of a screenshot of this email. Defendant Viccki filed a "*pro se*" Motion to Dismiss that has the same unique similarities as the filings for Defendant and defendants in Table 1 except that the metadata author field was left blank. Attached here to as **Exhibit 4** is a true and correct copy of that Motion.

From: Jesun <iplawyer01@foxmail.com>
Sent: Monday, May 24, 2021 10:19 AM
To: Jake Christensen <jchristensen@gbc.law>
Cc: Isaku Begert <ibegert@gbc.law>; Justin Gaudio <jgaudio@gbc.law>; Amy Ziegler <aziegler@gbc.law>; ipcounsel <ipcounsel@yeah.net>
Subject: Settlement(Amazon)VICCKI_Nirvana, L.L.C

Hi Jake,

We are representing defendant below to contact you for settlement, please confirm if the defendant is involved in case 21-cv-01986. We know you are waiting for information from platform, but could you please provide evidence first?

Store name: VICCKI **Seller ID:** A3M1QKK1O7ENOJ

please kindly present your evidence, if appropriate, and your offer for the store.

Thank you

Jesun

Figure 8

8. **Exhibit 5** is a true and accurate copy of unpublished decisions cited in the corresponding Motion for Sanctions Against Defendant Womens Dresses -YIISU for Committing Fraud on the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 22nd day of June 2022 at Chicago, Illinois.

/s/ Isaku M. Begert
Isaku M. Begert
Counsel for Plaintiff Bludgeon Riffola Ltd.